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Acting United States Attorney  
District of Nevada  
TINA NAICKER, CSBN 252766  
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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SHERMAINE CARROLL,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-cv-02237-MMD-PAL

**JOINT STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S MOTION FOR  
REVERSAL OR REMAND**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for one week from March 13, 2018 to **March 21, 2018**. This is Defendant's fifth request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant is still sick. Counsel apologizes for the belated request but did not anticipate being out on sick leave. Defendant makes this request in good faith with no intention to unduly delay the proceedings.

1 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

2 Respectfully submitted,

3  
4 Dated: March 13, 2018

/s/ \*Cyrus Safa  
(\*as authorized by email on March 13, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

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7  
8 Dated: March 13, 2018


DAYLE ELIESON  
Acting United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

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11  
12 By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

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14  
15 **ORDER**

16 APPROVED AND SO ORDERED:

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19 DATED: March 15, 2018

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THE HONORABLE PEGGY A. LEEN  
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the  
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**  
4 **RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL OR REMAND** on the date and via  
5 the method of service identified below:

6 **CM/ECF:**

7  
8 Cyrus Safa  
9 Law Offices of Lawrence D. Rohlfing  
10 12631 E. Imperial Highway, Suite C-115  
11 Santa Fe Springs, CA 90670  
12 562-868-5886  
13 Fax: 562-868-5491  
14 Email: cyrus.safa@rohlflinglaw.com

15  
16 Gerald Welt  
17 Gerald M. Welt, Chtd.  
18 703 S. 8th St.  
19 Las Vegas, NV 89101  
20 702-382-2030  
21 Fax: 702-684-5157  
22 Email: gmwesq@weltlaw.com

23 Attorneys for Plaintiff

24  
25 Respectfully submitted this 13th day of March 2018,

26  
*/s/ Tina L. Naicker*  
TINA L. NAICKER  
Special Assistant United States Attorney